EXHIBIT "A"

Case 8-16-70246-las Doc 30-1 Filed 04/03/17 Entered 04/03/17 12:19:36

PRYOR & MANDELUP, L.L.P.

A Limited Liability Partnership Including Professional Corporations

675 Old Country Road Westbury, New York 11590-4513 Telephone: (516) 997-0999 Facsimile: (516) 333-7333

Michael Farina, Esq.

Extension: 238

E-Mail: mf@pryormandelup.com

February 21, 2017

Via Certified Mail
Return Receipt Requested
and Regular Mail
Jorge Villamizar
601 NE 57th Street
Miami, FL 33137

Re:

Joseph G. Kelly Construction

Management, Inc.

Case No.: 8-16-70246-LAS

Dear Mr. Villamizar:

Our office represents Robert L. Pryor, Chapter 7 Trustee (the "Trustee") of the Bankruptcy Estate of Joseph G. Kelly Construction Management, Inc. (The "Debtor"), which filed a voluntary petition for relief under Chapter 7 of the United States Bankruptcy Code on January 21, 2016. The case is pending in and for the United States Bankruptcy Court for the Eastern District of New York under the above referenced case number.

Our review of the Debtor's books and records indicates that you are indebted to the Debtor (and now by operation of law) to the Bankruptcy Estate of Joseph G. Kelly Construction Management, Inc. based upon a loan (the "Loan") made to you in the sum of \$10,000.00. A copy of the relevant page of the Debtor's general ledger evidencing this Loan to you is enclosed for your review.

Accordingly, demand is hereby made that you immediately turnover the sum of \$10,000.00 to our office payable to "Robert L. Pryor, Trustee, Estate of Joseph G. Kelly Construction Management, Inc." as payment of the aforementioned Loan.

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Jorge Villamizar

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In the absence of payment or a written statement of the reasons why you believe the payment is not due (along with supporting documentation) received by this office within thirty (30) days of the date of this letter, this debt will be considered valid. In that event, we will, take appropriate action to collect all amounts due to the estate.

Please be guided accordingly. If you have any questions, please do not hesitate to contact the undersigned.

Very truly yours,

PRYOR & MANDELUP, L.L.P.

By:

Michael A. Farina

9:41 AM 03/11/16 Accrual Basis

Joseph G Kelley Construction Management, Inc. General Ledger As of December 31, 2013

Jorge Villamizar Check Total Jorge Villamizar	Total John Ebanks	John Ebanks	Total Inventory Asset	Inventory Asset	Total due from officers	due from officers General Journal	Total due from living water church	due from living water church General Journal 12/3	Total Carl Project	Carl Project	Total BB	BB Transfer	Total B4H	B4H Check Transfer Transfer General Journal	Total A R Grubb	AR Grubb Deposit Deposit	Total 263SD	263SD General Journal	Туре
02/07/2013						12/30/2013	ater church	church 12/31/2013				12/16/2013		11/03/2013 11/25/2013 12/05/2013 12/03/2013		07/09/2013 12/04/2013		12/30/2013	Date
Wire						transfer		lransfer						Acct transfer		3722		transfer	Num
Jorge Villamizar						Olga & Igor Kroutoi								Building For Him		Anthony R Grubb Anthony R Grubb			Name
Loan												Funds Transfer		Contribution Funds Transfer Funds Transfer		Reimb - loan Payment on			Мето
SCNB1231						exchange		Living Water				SCNB1231		SCNB1231 SCNB1231 SCNB1231 SCNB1231 Building For Him		SCNB1231 SCNB1231		Construction	Split
10,000.00					-25,708.53	-25,708.53	-2,936.20	-2,936.20			-30,000.00	-30,000.00	-3,023.17	2,500.00 1,200.00 3,000.00 -9,723.17	-300.00	-200.00 -100.00	304.80	304.80	Amount
10,000.00 10,000.00	2,663.20	2,663.20	0,00	0.00	0.00	25,708.53 0.00	0.00	2,936.20	0.00	0,00	-74,06	29,925.94 -74.06	0.00	3,023.17 5,523.17 6,723.17 9,723.17 0.00	156.10	456,10 256,10 156,10	0.00	-304.80 0.00	Balance